

NEW JERSEY OFFICE
130 POMPTON AVENUE
VERONA NJ 07044
(973) 239-4300



NEW YORK OFFICE
48 WALL STREET – 5TH FL.
NYC, NY 10005
(646) 779-2746

LORRAINE@LGRLAWGROUP.COM
WWW.LGAULIRUFO.COM
FAX: (973) 239-4310

August 28, 2020

Via ECF
Hon. Jesse M. Furman
United States District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v Arguendas (Jacob Padin)*
20 Cr. 135 (JMF)

Dear Judge Furman:

Your Honor ordered the temporary release of Jacob Padin on April 8, 2020, because of the threat that COVID-19 posed to his health at the jail. According to his Pretrial Service Officer, Bernisa Mejia, Mr. Padin has been fully compliant with the terms of his temporary release. Mr. Padin has sought and obtained three extensions of his temporary release and currently seeks an extension until September 30, 2020, because of the ongoing pandemic in our country.

Our country continues to face unprecedented challenges from the coronavirus pandemic, with the number of cases across the country continuing to rise. Just last week there was an increase in 294,083 new COVID-19 cases in the United States.¹ As of August 21, 2020, almost 160,000 prisoners and staff in US prisons had been infected with the coronavirus and 1002 people have died.² The BOP is currently in phase 9 of its COVID-19 Action Plan implemented to

¹ <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html>

² <https://eji.org/news/covid-19s-impact-on-people-in-prison/>

curtail the spread of COVID-19,³ yet, the number of new COVID-19 cases around the country continues to rise and has broken daily records in the last month, and we have seen major outbreaks in federal jails as well in the last month.

Because of this, and in light of his severe asthma, Mr. Padin respectfully requests that Your Honor extend his temporary release until September 30, 2020. Mr. Padin's Pretrial Service Officer Bernisa Mejia takes no position on his request and Andrew Chan, AUSA, responded "[f]or the reasons stated in its prior oppositions (Docket Nos. 54, 71, 83, 139, 159), the Government respectfully opposes the defendant's request for an extension of his temporary release."

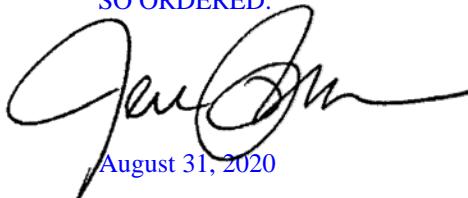
Your Honor's time and consideration of this request is greatly appreciated.

Respectfully submitted,
s/
Lorraine Gauli-Rufo
Attorney for *Jacobb Padin*

cc: Andrew Chan, AUSA
Danielle Sassoon, AUSA
Bernisa Mejia, PTSO (*via email*)

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 215.

SO ORDERED.



A handwritten signature in black ink, appearing to read "Lorraine Gauli-Rufo".

August 31, 2020

³[chrome-extension://oemmndcblboiebfnladdacbdmadmin/https://prisonology.com/wp-content/uploads/2020/08/COVID-19-Phase-9-COVID-Action-Plan.pdf](https://oemmndcblboiebfnladdacbdmadmin/https://prisonology.com/wp-content/uploads/2020/08/COVID-19-Phase-9-COVID-Action-Plan.pdf)